UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
SECURITIES AND EXCHANGE COMMISSION,	x :
Plaintiff,	: 19 Civ. 09439 (PKC)
- against -	: ECF Case
TELEGRAM GROUP INC. and TON ISSUER INC.	: Defendants.
	x

NOTICE OF MOTION

PLEASE TAKE NOTICE that Non-party also referred to as Investor B, moves this Court for an order to maintain the filing under seal the documents lodged with the Court by the Securities and Exchange Commission as Exhibits D and E to the Declaration of Investor B, PX2. This motion is based upon the concurrently filed memorandum of law and the declaration of Added February 4, 2020.

Dated: February 4, 2020

Respectfully submitted,

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Attorneys for Non-Party Investor B